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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

-----X
ABDUS SHAHID

Plaintiff

VERIFIED COMPLAINT

-against-

BOROUGH OF DARBY
Defendant

11 2772

- X
1. That all times herein after mentioned the plaintiff is USA citizen of Bangladesh origin and Asian and residing at 455 Tompkins Ave, Apt#2R, Brooklyn, New York 11216.
 2. That all times herein after mentioned the defendant is a City Government under State of Pennsylvania.
 3. That all times herein after mentioned the plaintiff is the owner of the property 850 Summit Street, Darby, PA 19023 under the Borough (City) of Darby.

Defendant violated plaintiff's Civil Right continuously from February 1, 2006 through April 25, 2011 due to plaintiff's race, color, and nation of origin.

4. Plaintiff bought the large Warehouse 850 Summit Street, Darby, PA 19023 on January 23, 2006. The property has 10 separate units to rent separately. Borough of Darby said plaintiff was not allowed to rent vacant 7 units of the property due to plaintiff's race, color, and nation of origin. Borough of Darby inspected whole building and did not find violations in 10 units of the property in 2006 and later.

long
given
4/26/11

5. Plaintiff rented the units to the identical businesses as it was rented before. Still Borough of Darby intentionally prohibited to rent 7 vacant units of the property from February 2006 through April 2011. Each month plaintiff lost \$10,000.00 rent due to racial discrimination of Borough of Darby and total rent lost was \$750,000.00.

6. Borough of Darby also prohibited three Chinese people to open business in Darby Borough because of race, color and nation of origin. Plaintiff was present in that Borough council meeting when Darby Borough denied opening business by plaintiff and three Chinese people due to race, color and nation of origin. Darby Borough wants only black people to open business in this Borough as most of the people of this Borough are black. Darby Borough is one of the dangerous racist Boroughs of Pennsylvania.

7. Darby Borough told all prospective tenants that plaintiff coming from different country and race would not be allowed to do business in this city.

8. Even this dangerous racist Borough told plaintiff in Council meeting and other meeting that they would not allow Plaintiff to make any business coming from another country. Borough said plaintiff bought the property and would pay Borough tax, County Tax, School tax, mortgage but could not

rent any unit to make profit coming from different country. Plaintiff paid mortgage, borough tax, county tax, school tax from own pocket due to racial discrimination of Darby Borough due to plaintiff's race, color and nation of origin.

Plaintiff filed this civil action against Borough(City) of Darby for deprivation of plaintiff's civil rights pursuant to CIVIL RIGHT LAW 42 USCA 1983.

WHEREFORE, plaintiff demands judgment against defendant Eighteen Million Dollars (\$18 Million) for intentional deprivation of plaintiff's civil right due to plaintiff's race, color, nation of origin; and for plaintiff's sufferings from severe emotional distress from February 2006 through April 2011 continuously due defendant.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Brooklyn, New York
April 25, 2011

Abdus Shahid

Abdus Shahid(Plaintiff /Landlord)
455 Tompkins Ave, Apt#2R
Brooklyn NY 11216
Telephone: 347-304-4662
E mail address: shahidx@msn.com

TO:

Borough of Darby
821 Summit Street
Darby PA 19023.

VERIFICATION

Abdus Shahid, being duly sworn, deposes and says: that I have read the foregoing and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and as to those matters, I believe the same to be true.

Dated: Brooklyn, New York

4/25/2011

Abdus Shahid

Abdus Shahid

Sworn to before me

4/25/2011

~~Notary public
State of New York~~

YITZCHOK RING
Notary Public, State Of New York
No. 01RI5015261
Qualified In Kings County
Commission Expires July 19, 2005/2

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